

ORIGINAL

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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Mailing Online Service)

Docket No. MC98-1

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORY TO UNITED STATES POSTAL SERVICE
WITNESS: LEE GARVEY
(OCA/USPS-T1-73)
(November 13, 1998)

Pursuant to sections 25 and 26 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits interrogatories and requests for production of documents. Instructions included with OCA interrogatories OCA/USPS-T1-1-7 to witness Lee Garvey, dated July 21, 1998, are hereby incorporated by reference.

Respectfully submitted,



Gail Willette
Acting Director
Office of the Consumer Advocate



Emmett Rand Costich
Acting Assistant Director


OCA/USPS-T1-73. Please refer to your response to part a. of interrogatory

OCA/USPS-T1-49.

- a. Please provide a citation for the quotation beginning with "Merge and presort."
The citation should include document title, date, page number, and line number.
- b. Please provide a copy of the complete document cited in response to part a. of this interrogatory.
- c. Please explain how the phrase "maximizing postal automation efficiency" relates to "the capability to combine all like documents into co-mingled batches."
- d. Please provide a copy of (or page and line citation to) any documents that impose an explicit obligation on the MOL system developer to incorporate "the capability to combine all like documents into co-mingled batches."

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.


Emmett Rand Costich
Attorney

Washington, D.C. 20268-0001
November 13, 1998